STATE OF SOUTH CAROLINA (Caption of Case) In Re: Frontier Communications of the Carolinas LLC Petition Requesting the Commission's Intervention in Numbering Resources Determination for the Hollywood Rate Center)) BEFORE THE) PUBLIC SERVICE COMMISSION) OF SOUTH CAROLINA)) COVER SHEET)) DOCKET) NUMBER:			
(Please type or print			SC Daw Manuals	15025	
Submitted by:	C. Jo Anne Wess		SC Bar Numbe		1
Address:	P.O. Drawer 778		Telephone:	803-771-4400	-
	(1900 Barnwell S Columbia, SC 29		Fax: Other:	803-779-0010 803-576-3714	
	Columbia, SC 25	7202		ichardsonplowden	
Other:	elief demanded in p		URE OF ACTIO		t's Agenda expeditiously
☐ Electric			Letter		Request
☐ Electric/Gas		Agreement	☐ Memorand	um	Request for Certification
☐ Electric/Teleco	mmunications	Answer	Motion		Request for Investigation
☐ Electric/Water		Appellate Review	Objection		Resale Agreement
☐ Electric/Water/	Telecom.	☐ Application	Petition		Resale Amendment
☐ Electric/Water/	Sewer	Brief	Petition for	r Reconsideration	Reservation Letter
Gas		Certificate	Petition for	Rulemaking	Response
Railroad		Comments	Petition for	Rule to Show Cause	Response to Discovery
Sewer		Complaint	Petition to	Intervene	Return to Petition
	ations	Consent Order	Petition to I	ntervene Out of Time	☐ Stipulation
☐ Transportation		Discovery	Prefiled Te	estimony	Subpoena
☐ Water		Exhibit	Promotion		☐ Tariff
☐ Water/Sewer		Expedited Consideration	on Proposed (Order	Other:
☐ Administrative	Matter	Interconnection Agreeme	nt Protest		
Other:		Interconnection Amendm		Affidavit	
		Late-Filed Exhibit	Report		



COLUMBIA P.O. Drawer 7788 • Columbia, SC 29202 1900 Barnwell St., Columbia, SC 29201 P 803.771.4400 F 803.779.0016

MYRTLE BEACH P.O. Box 3646 • Myrtle Beach, SC 29578 2103 Farlow St., Myrtle Beach, SC 29577 P 843.448.1008 F 843.448.1533

CHARLESTON P.O. Box 21203 • Charleston, SC 29413
171 Church St., Suite 150, Charleston, SC 29401 P 843.805.6550 F 843.805.6599

www.richardsonplowden.com

REPLY TO: Columbia E-mail address for Steven W. Hamm shamm@RichardsonPlowden.com Direct Dial: (803) 576-3713

E-mail address for C. Jo Anne Wessinger Hill jwessingerhill@RichardsonPlowden.com Direct Dial: (803) 576-3714

January 20, 2017

VIA ELECTRONIC FILING

The Honorable Jocelyn Boyd, Chief Clerk Public Service Commission of South Carolina 101 Executive Center Drive, Suite 100 Columbia, South Carolina 29210

Re: Frontier Communications of the Carolinas LLC Petition Requesting the Commission's Intervention in Numbering Resources Determination for the Hollywood Rate Center

Dear Ms. Boyd:

Frontier Communications of the Carolinas LLC ("Frontier") submits this request to the Public Service Commission of South Carolina ("Commission") for expedited review and waiver of the Neustar Pooling Administrator's ("PA") denial of Frontier's request for additional numbering resources to support its ability to provide reliable and adequate service to its customers.

Under federal numbering rules, a state commission may overturn the PA's decision based on the determination that the carrier has demonstrated a verifiable need for the numbering resources and has exhausted all other available remedies. In its Third Report and Order in the Number Resource Optimization proceeding, the Federal Communications Commission ("FCC") concluding that "a carrier should be able to get additional number resources when there is

¹ 47 C.F.R. § 52.15(g)(4)

The Honorable Jocelyn Boyd, Chief Clerk January 20, 2017 Page 2

verifiable need due to the carrier's inability to satisfy a specific customer request." ²Thus, the Commission has the authority to overturn the PA's decision in this matter.

The specific facts giving rise to Frontier's request are as follows:

The additional numbering resources are required to permit Frontier to provide service via a new packet switch in the Hollywood rate center that is being deployed to complete projects supported by the FCC's Connect America Fund Phase II ("CAF II") and to develop a Voice over Internet Protocol ("VoIP") service in that respective LATA. Pursuant to the applicable industry *Location Routing Number (LRN) Assignment Practices document (ATJS-0300065)*, Frontier must establish a unique LRN to identify the recipient switch or P01. Thus, Frontier must obtain an LRN for this new packet switch. Also pursuant to industry guidelines, only an NXX code holder can obtain an LRN, thus necessitating Frontier's request for an NXX code, for this rate center. (It should be noted, however, that Frontier would retain only a single thousand-number-block from the new NXX code.)

On October 21, 2016, Frontier submitted the Thousands-Block Application Form to Neustar acting as the PA, for the Hollywood rate center. That same day, the PA denied the Application because Frontier did not meet the FCC's utilization requirement. Attached please find a copy of Frontier's Application and the PA's denial.

Frontier has demonstrated a verifiable need. Frontier respectfully seeks the Commission's reversal of Neustar's decision and requests that it direct Neustar to grant Frontier's application. Frontier respectfully requests that the Commission act upon this letter within ten business days.

If you have any questions regarding this filing, please contact me.

Sincerely

Anne Wessinger Hill

CJWH/dwf Attachments

cc: Counsel of Record

² Number Resource Optimization, Third Report and Order and Second Order on Reconsideration, FCC 01-362, 17 FCC Rcd 252, ¶ 64 (2001) ("Third Report and Order").

Tracking Number:

Rate Centervi:

HOLLYWOOD

843-HOLLYWOOD-SC-952743

Thousands-Block Application Form - Part 1A Revised: January 4, 2016

Full NXX: LRN

	I UII IVXX. LIXII				
Type of Application:	₩ New	Change i	Disconnec	t	
1.1 Contact Inf		l Application In	formation		
Block Applican	ıt:				
Company Name:		IMUNICATIONS	OF THE C	AROLINAS INC - SC	
Headquarters Address:	180 S. Clinton A	ve.			
City:	<u>Rochester</u>	State:	<u>NY</u>	ZIP: <u>14646</u>	
Contact Name	Stephen Bonno				
Contact Address:	180 S. Clinton A	ve.			
City:	Rochester	State:	<u>NY</u>	ZIP: <u>14646</u>	
Phone: <u>585-7</u>	777-8011	Fax: <u>585-454-67</u>	<u>726</u>		
E-mail: steph	en.bonno@ftr.co	<u>m</u>			
Pooling Admin					
	: John Auerbach				
Contact Address:	1800 Sutter St. S	Ste. 780			
City:	Concord	State:	CA	ZIP: 94520	
Phone:	925-363-8706	Fax: <u>925-363-76</u>	684		
E-mail: john.auerbach@neustar.biz					
1.2 General Information:					
Check one : No	o LRN needed	_ LRN needed ⁱⁱⁱ :	<u>X</u>		
NPA: 843	LATA: 436	OCN ^{iv} : 4335	Parent Cor OCN 340		
Number of Thousands-Blocks Requested : 1					
Switch Identification (Switching Entity/POI ^v): HLWDSCXAPS0					

1.3 Dates:							
Date of Rec Application ^{vii} : 10/21/2016 Date	quested Effective te ^{viii} : <u>11/21/2016</u>						
Requested Expedited Treatment? (See Expedited Explanation: NEED THIS HOLLYWOOD RATE CENTER	Section 8.6) Yes X No No SERN FOR LAUNCH OF VOIP PRODUCT IN						
effective date the Administrator can grad	owledge that I am requesting the earliest possible nt. Please note that this only applies to a reduction nowever the request will still be processed in the						
1.4 Type of Service Provider Requesting	g the Thousands-Block :						
a) Type of Service Provider : Incu (ILEC) (LEC, IXC, CMRS, Other)	mbent Local Exchange Carrier						
b) Primary Type of Service Blocks to	be used for : Wireline						
c) Thousands-Block(s) (NXX-X) assig	c) Thousands-Block(s) (NXX-X) assignment preference (Optional) 843-890-						
	are undesirable for this assignment , if						
	oses, indicate which block(s) you will be keeping (the the pool)843-xxx-7,						
1.5 Type of Request:							
	If Yes, attach evidence of authorization and						
proof of capability to provide service with Growth block for rate center: Yes	X If Yes, attach months to exhaust worksheet						
-							
By selecting this checkbox, I ack	knowledge that I am willing to accept a block in red lying CO code may not yet be activated in the PSTN fective date.						
Type of change (Mark all that apply)							
OCN: Intra-company ^{ix}	Switching Id Part 1B						
OCN: Inter-company ^x	Effective Date						
Change block : YesIf Yes, list							
1.6 Block Return :							
a) Is this block Contaminated: Yes	No						
b) If Yes how many TNs are NOT ava							
	completed in the NPAC: Yes No						
d) Has this block been protected from	further assignment: Yes No						

Disconnect block : Yes	_If Yes, list NPA-NXX-X	
Remarks:		

I hereby certify that the above information requesting an NXX-X block is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block (NXX-X) Pooling Administration Guidelines ATIS-0300066 available on the ATIS web site (www.atis.org/inc) or by contacting inc@atis.org as of the date of this application.

Stephen BonnoSr. Engineer-Number Planning10/21/2016Signature of Block ApplicantTitleDate

Instructions for filling out each Section of the Part 1A form:

Section 1.1 Contact information requires that Service Providers supply under "Block Applicant" the company name, company headquarters address, a contact within the company, an address where the contact person may be reached, in addition to the correct phone, fax, and e-mail address. The Pooling Administrator section also requires the Service Provider to fill in the Pooling Administrator's name, address, phone, fax and e-mail.

Section 1.2 Service Providers who need a thousands-block assignment or for an Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a CO Code Application needs to also be submitted to the PA. The Service Provider should supply the Numbering Plan Area (NPA); the Local Access Transport Area (LATA), which is a three-digit number that can be found in the Telcordia Technologies, Inc. dba iconectiv (iconectivTM) LERGTM Routing Guide^{xi}. The Operating Company Number (OCN) assigned to the service provider and the OCN of its parent company. An OCN is a four-character alphanumeric NECA-assigned Company Code or a four-character alphanumeric identifier assigned by the iconectivTM Telecom Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification. Explanations of these terms may be found in the footnotes.

Section 1.3 The date the Service Provider completes the application should be entered in this section, as well as the Effective Date of the requested thousands-block.

Section 1.4 Service Providers should indicate their type, e.g., local exchange carrier, competitive local exchange carrier, interexchange carrier, CMRS or VoIP. Also indicate the primary type of business in which the numbering resource is to be used. Service Providers may indicate their preference for a particular thousands-block, e.g., 321-9XXX, or indicate any thousands-blocks that may be undesirable, e.g., 321-6XXX.

Section 1.5 Service Providers indicate the type of request. Initial requests are for first applications for thousands-blocks in a rate center, growth for additional thousands-blocks in a rate center in which the applicant already has numbering resources, and provide the required evidence as ordered by the FCC.

Section 1.6 Service Providers must indicate the updated/current information in regards to contaminated TNs on the block they are returning to the pool. Blocks with over 10% contamination (101 TNs or more) shall not be returned to the pool except when a service provider is exiting the market or is exchanging a block that was identified as being over 10% contaminated. If the block being returned is over 10% contaminated, the PA shall seek a new block holder. If question c and/or d have a response of No, the request for return shall be denied.

The thousands-block applicant certifies veracity of this form by signing their name, and providing their title and date.

Footnotes:

Identify the type of change(s) in Section 1.5.

"The Pool Administrator is available to assist in completing these forms.

"A CO Code application will also need to be submitted to the PA.

"Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments should contact NECA (800 524-1020) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignments should direct questions regarding appropriate OCN usage to TRA (732-699-6700).

^vThis is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character CLLITM Code of the switch /POI.

"Rate Center name must be a tariffed Rate Center.

vii Acknowledgment and indication of disposition of this application will be provided to applicant within seven calendar days from the date of receipt of this application. An incomplete form may result in delays in processing this request.

Please ensure that the NPA-NXX of the LRN to be associated with this block(s) is/will be active in the PSTN prior to the effective date of the block(s).

X Select if you are the current Block Holder.

* Select if you are not the current Block Holder

^{XI} Common Language[®] and Telcordia[®] are registered trademarks and CLLI^{IM}, LERG^{IM} Routing Guide and iconectivTM are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

Back

neustar.

Thousands-Block Number Pooling Administration Guidelines (TBPAG) - Appendix 3 Revised: January 4, 2016

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level¹

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: 843-HOLLYWOOD-SC-952743

Company Name: FRONTIER COMMUNICATIONS Date: Friday, October 21, 2016 OCN:4335

OF THE CAROLINAS INC - SC

Rate Center: HOLLYWOOD

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)²:843-889-0,1,2,3,4,5,6,8,9

Name of Block Applicant: Stephen Bonno Signature: Stephen Bonno

Title: Sr. Engineer-Number Planning Phone: <u>585-777-8011-</u> Fax: 585-454-6726

E-Mail: stephen.bonno@ftr.com

A. Available Numbers: 5822

B. Assigned Numbers: 3178

C. Total Numbering Resources: 9000

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation ³:1000

List **Excluded** Code(s)

Block(s):

Mont Month h 2 6 8 10 1 3 5 12

E. Growth History -100 100 100 100 100 100 Previous 6 months4

100 100 100 Forecast -100 100 100 100 100 100 100 100 100 Next 12

***********	months ⁵					- Light recognition	
	G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6):100.0						
	H. Months to Numbers Available for Assignment to Exhaust ⁶ Customers (A)						
		Average Monthly Forecast (G)					
		Block Requested 1	Available Numbers 5822	1	Months To Exhaust 58.22		
	I. Utilization ⁷ =	Assigned Numbers (B)	X 100 =	<u>39.725</u>			
		Total Numbering Resources (C)-Excl Numbers (D)	uded				
	Explanation: 1 A copy of this worksheet is required to be submitted to the Pooling Administrator when requesting additional numbering resources in a rate center. For auditing purposes, the applicant must retain a copy of this document. 2 Report on all resources for the requested geographic area, including newly acquired blocks/codes. 3 Quantity of numbers activated in the past 90 days is based on blocks and/or codes received from the administrator and shall be reported in increments of 1,000 or 10,000 TNs (e. g.: 2 blocks received=2,000 and 1 code received =10,000). 4 Net change in TNs no longer available for assignment in each previous month, starting with the most distant month as Month 1, and Month 6 as the current month. 5 Forecast of TNs needed in each following month, starting with the most recent month as Month 1. 6 To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (47 CFR § 52.15 (g) (4) (iii)). Newly acquired numbers may be excluded from the Utilization calculation (47 CFR § 52.15 (g)(4)(iii))						
n	eustar						

Thousands-Block Number Pooling Administration Guidelines (TBPAG) - Part 3

Revised: January 4, 2016

Pooling Administrator's Response/Confirmation

Tracking Number :	843- HOLLYWOOD-S 952743	SC-	
Date of Application:	10/21/2016	Effective Date:	
Date of Receipt:	10/21/2016	Date of Response:	10/21/2016
Service Provider Name:	FRONTIER CO	MMUNICATIONS OF	FTHE
(LERG [™] Routing Guide ¹) OCN:	4335		
Parent Company OCN:	3400		
NPAC SOA SPID :			
Pooling Administrator Cont	act Information:	e:	925-363-8706
Signature of Pooling Admir			
John Auerbach	Fax:		925-363-7684
Name (print) Email:	john	.auerbach@neustar	biz
NPA-NXX or NPA-NXX-X :		Block Assigned:	
		Block Reserved :	
		Block Reservation Expiration Date :	
		Block/Code Modified :	
		Block/Code Disconnected :	
Block Contaminated	(Yes or No):		
If yes, enter the number	per of TNs contamin	ated (1-1000):	
Switch Identification (Switching/POI) ² :	1	HLWDSCXAPS0
Rate Center:			HOLLYWOOD
X Form complete, reque	est denied.		

	therefore this request for a new code is denied. You may proceed with requesting a State Waiver from the appropriate state commission using this Part 3 denial. If you are in disagreement with the disposition of this request, please refer to the Thousands-Block Number (NXX-X) Pooling Administration Guidelines for the appeals process.
	Request Withdrawn.
	Explanation:
	Assignment Activity Suspended by Administrator.
	Explanation:
R	emarks:
1	Telcordia [®] is a registered trademark and LERG [™] Routing Guide and iconectiv [™] are
1 tr 2 rost	

Central Office Code Assignment Guidelines (COCAG) Central Office Code (NXX) Assignment Request-Part 1

Revised: January 4, 2016

Tracking	843-HOLLYWOOD-SC-952743			
Number:				
	Full NXX: LRN			
Type of	New Change ¹			
Application:	Delete			
1.0 GENERAL IN	FORMATION			
1.1 Contact Inform	nation:			
Code Applicant:				
Company/Entity Name:	FRONTIER COMMUNICATIONS OF	THE CAROLI	NAS INC - SC	
Headquarters				
Address:	180 S. Clinton Ave.			
City, State, Zip:	Rochester, NY, 14646			
Contact Name:	Stephen Bonno			
	180 S. Clinton Ave.			
City:	Rochester	State:		ZIP: <u>14646</u>
Phone:	<u>585-777-8011</u>	Fax:	<u>585-454-</u> <u>6726</u>	
E-mail:	stephen.bonno@ftr.com			
Code Administrate	or: ²			
Name:	Michael Ortega			
Address:	46000 Center Oak Plaza			
City:	Sterling	State:		ZIP: <u>20166</u>
Phone:	571-434-5348	Fax:	<u>571-434-</u> 5502	
			3302	
4.0 ND4.040	NXX: ³ LATA: 436 OC	CN:⁴4335	Parent	
1.2 NPA: <u>843</u>	Company's OCN(s) 3400			
Switching Identific	cation (Switching Entity/POI) ⁵ HLWDSC	CXAPSO		
Locality/City/Wire	Center:		Ra	ate Center:6HOLLYWOOD
Homing Tandem	Operating Co. ⁷ :AT&T		Tandem Hom	ing
			CLLI ^{TM8} :CHT	NSCD1601
1.2 Detec				
1.3 <u>Dates</u>		Regue	sted Effective	
Date of Applicatio	n: <u>10/21/2016</u>	Date:9,	10	11/21/2016
7				
By selecting	this checkbox, I acknowledge that I am	requesting th	e earliest pos	sible effective date the
	grant. Please note that this only applie est will still be processed in the order re		in the Admii	instrator's processing time,
	,			
Request Expedite	d Treatment Yes X No			

Expedite Documentation must be provided if "Request Expedite" = Yes
Expedited Explanation: NEED THIS LRN FOR LAUNCH OF VOIP PRODUCT IN HOLLYWOOD RATE
CENTER
1.4 a) Type of Company/Entity Requesting Code (LEC, IC, CMRS, Other): <u>Incumbent Local Exchange</u> Carrier (ILEC)
b) Type of service (e.g., Cellular - Type 2): Wireline
c) Code Assignment Preference (Optional)843-890-7
d) Codes that are undesirable, if any
e) Type of Change (Mark all that apply)
OCN-Intra-company Switching Id Rate Center Tandem Homing CLLI
OCN-Inter-company ¹² Effective Date LATA Extend Reservations
1.5 Type of Request (Initial, growth, etc.) Growth
If an initial code, attach (1) evidence of certification and (2) proof of ability to place code in service within 60 days. If a growth code, attach months to exhaust worksheet.
Pooling Indicator: 13 Yes No
1.6 NPA Jeopardy Criteria Apply: Yes No
1.7 Code request for new service (Explain):
1.8 It is the code applicant's responsibility to arrange input of Part 2 information into BIRRDS. The 45-calendar day nationwide minimum interval cut-over for BIRRDS will not begin until input into BIRRDS has been completed.
Comments:
I hereby certify that the above information requesting an NXX code is true and accurate to the best of my knowledge and that this application has been prepared in accordance with Central Office Code (NXX) Assignment Guidelines posted to the ATIS web site (http://www.atis.org/inc/incguides.asp) as of the date of this application 14.
Stephen Bonno Sr. Engineer-Number Planning 10/21/201
Signature of Code Applicant Title Date
¹ Identify type and reason for change(s) in Section 1.4(e). ² A list of the current Code Administrator(s) who can provide assistance in completing this form is available upon request from NANPA. ³ The NXX field is required for any code request in which there is a change or the NXX is being returned. ⁴ Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or

Company Code assignments may contact NECA (800-228-8597) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignment should direct questions regarding appropriate OCN usage to the iconectiv TelcordiaTM Routing Administration (TRA) on 732-699-6700.

⁵This is an 11 character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character Common Language[®] Location Code (CLLITM Code) of the applicant's switch or POI. Common Language[®] and Telcordia[®] are registered trademarks and CLLITM, LERGTM Routing Guide and iconectivTM are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

⁶Rate Center name must be a tariffed Rate Center associated with toll billing.

Applies to any code applicant connecting to the Public Switched Telephone Network via a tandem owned by a different carrier.

⁸This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLITM Location Identification Code of the switching entity/POI, and is the same on Part 2, Form 1, Page 2 of 2.
⁹Code applicants should request an effective date that is at least 66 calendar days from the submission of this form. It should be noted that interconnection arrangements and facilities need to be in place prior to activation of a code. Such arrangements are outside the scope of these guidelines.

¹⁰Requests for code assignment shall not be made more than six months prior to the requested effective date.

¹¹Select if you are the current Code Holder

¹²Select if you are <u>not</u> the current Code Holder

¹³The Applicant will indicate "YES" if the NXX being requested will be used for thousands-block number pooling and will leave this field blank if it is not.

¹⁴An incomplete form may result in delays in processing this request.

Back

neustar

BEFORE THE PUBLIC SERVICE COMMISISON OF SOUTH CAROLINA DOCKET NO.: _____-C

In Re:	
Frontier Communications of the Carolinas)
LLC Petition Requesting the Commission's)
Intervention in Numbering Resources	j j
Determination for the Hollywood Rate	j j
Center)

CERTIFICATE OF SERVICE

The undersigned, hereby certifies that the foregoing Petition was delivered to the following counsel electronically and/or by causing a copy of same to be mailed in the United States Mail, Postage Prepaid, First Class, addressed as follows:

The Honorable Jocelyn Boyd, Chief Clerk
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, SC 29201
(via U.S. Mail)

Jeffrey M. Nelson , Counsel Office of Regulatory Staff 1401 Main Street, Suite 900 Columbia, SC 29201 (via U.S. Mail)

> Denise W. Fenters Legal Assistant